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*Attorneys for Defendants
James Dzurenda, Brian Williams,
and Christopher Zuniga*

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

JEREMY BRYSON,

Plaintiff,

v.

ZUNIGA, *et al.*,

Defendants.

Case No. 2:20-cv-00089-JAD-BNW

**DEFENDANTS' MOTION TO EXTEND
DISPOSITIVE MOTIONS DEADLINE
ESTABLISHED BY COURT ORDER
(ECF NO. 29)
(Second Request)¹**

Defendants James Dzurenda, Brian Williams, and Christopher Zuniga, by and through counsel, Aaron D. Ford, Attorney General of the State of Nevada, and Chris Davis, Deputy Attorney General, hereby moves, pursuant to Fed. R. Civ. P. 6(b) and 16(b)(4) and Local Rules IA 6-1 and LR 26-3 to extend the dispositive motions deadline established by Court Order (ECF No. 29) by sixty (60) days from **Monday, January 24, 2022, to Friday, March 25, 2022.** This motion is brought based on the following Points and Authorities, the good cause set forth in the Declaration of Chris Davis Esq., and the pleadings and papers filed in this matter.

¹ The parties stipulated to extend discovery on September 21, 2021. *See* ECF No. 28. This is the first request to extend the dispositive motion deadline.

DECLARATION OF CHRIS DAVIS, ESQ.

I, Chris Davis, declare under penalty of perjury that the following is true and correct of my own personal knowledge and if called to testify in this matter would testify as follows:

1. I am a Deputy Attorney assigned to represent the Defendants James Dzurenda, Brian Williams, and Christopher Zuniga in this matter.

2. I was hired by the Office of Attorney General on September 13, 2021, and began working in the post-conviction habeas unit. Because of a shortage of attorneys representing the Nevada Department of Corrections (NDOC). I volunteered to transfer to the NDOC unit, and was scheduled to begin on November 29, 2021.

3. On November 19, 2021, however, my father passed away due to Covid related illness. As a result, I was required to take personal leave in order to manage my father's funeral arrangements. That personal leave required me to delay my transfer until December 6, 2021, while still working for the Attorney General's post-conviction habeas unit. I was effectively handling a double case load until December 23, 2021, when I completed my last assignment for the post-conviction unit for the Office of the Attorney General.

4. In December 2021, Deputy Attorney General Frank DiMaggio, the attorney assigned to this matter announced his resignation, and on December 28, 2021, this matter was assigned to me. In addition to my significant case load, I immediately began reviewing the file in this matter.

5. Upon review, I discovered that Plaintiff had been paroled on November 22, 2021 (Ex. A Case Note at 3), but did not update his address with the Court. As consequence, on December 17, 2021, this Court entered an order requiring Plaintiff to "file his current address with the Court by January 7, 2022," and warning that "failure to comply with this Order may result in a recommendation to the District Judge that this case be dismissed." See Order, ECF No. 34.

6. Unbeknownst to me, on December 2, 2021, Plaintiff was arrested by the National Park Services, after recklessly driving over Hoover Dam and refusing to stop. See Ex. B, Non-Technical Violation Report, at 1. Plaintiff was charged with driving under the influence, reckless driving, and trespass, and found with drug paraphernalia. See Ex. B, Non-Technical Violation Report, at 1. Plaintiff was held in federal custody at the federal courthouse, located at 333 S. Las Vegas Blvd. See Ex. B, Non-

1 Technical Violation Report, at 1. On December 29, 2021, a warrant for retaking paroled prisoner was
2 issued. *See* Ex. C, Warrant. After being transferred to the Clark County Detention Center for pick up,
3 Plaintiff was returned to High Desert State Prison (HDSP) on January 10, 2022. *See* Ex. A Case Note at
4 3. On that same day, the Magistrate Judge entered a Report (ECF No. 36) recommending that this “case
5 be dismissed without prejudice” for the failure to update his address by January 7, 2021.

6 7. Because this case had been recommended for dismissal, I opted not to prepare a motion
7 for summary judgment and focus my attention on other cases that were more pressing. On January 24,
8 2022, I reviewed the file to determine if Plaintiff had objected to the recommendation to dismiss. I
9 discovered that on January 18, 2022, Plaintiff filed an objection to the report and recommendation.
10 Plaintiff, however, does not dispute that he failed to update his address while out on parole or provide
11 any excuse for failing to do so. Instead, Plaintiff wrongly insinuates that he has been on covid-19
12 lockdown at the Clark County Detention Center (CCDC), which prevented him from updating his
13 address, without any explanation why Plaintiff failed to update his address while he was out on parole
14 for 11 days. *See* Written Objection, ECF No. 37.

15 8. Upon discovering Plaintiff’s objection, I conducted an investigation to determine the facts
16 surrounding why Plaintiff was no longer on parole, the results of which are set forth above. I also
17 attempted to contact Plaintiff to determine whether he would be willing to stipulate to an extension. I
18 however, was unable to do so due to regulations requiring at least one day notice for covid testing prior
19 to scheduling a telephonic meeting.

20 9. While I have diligently pursued the cases assigned to me, including this one, my ability to
21 do so has also been hindered by the New Year Holiday, my pre-planned time for my wedding anniversary
22 (January 3rd), and my substantial case load I had taken on when transferring to the NDOC unit.
23 Additionally, shortly after the New Year, my son, who has a substance abuse problem, relapsed. As this
24 case was recommended for dismissal, I reasonably concluded that my time would be better spent on more
25 pressing matters because any dispositive motion drafted would have required countless hours to review
26 the record and law, but would likely be dismissed as moot based on the recommendation of the Magistrate
27 Judge.

10. Based on the forgoing, good cause is present to grant an extension of sixty (60) days. Counsel for Defendants reasonably concluded that this case was subject to dismissal and that Defendants should not pursue a motion for summary judgment until the district court resolves Plaintiff's objection to the Report and Recommendation, where in the Magistrate Judge recommended dismissal based on Plaintiff's unexplained failure to update his address while on parole. Sixty (60) days is reasonable based on the time required for the district court to resolve the objection, the long hours necessary to draft a dispositive motion due counsel's unfamiliarity with the case, the holidays, and counsel's personal family emergencies.

Dated this 24th day of January, 2022.

AARON D. FORD
Attorney General

By: /s/ Chris Davis
Chris Davis

POINTS AND AUTHORITY

Pursuant to Fed. R. Civ. P. 6(b), the "court may, for good cause, extend the time . . . with or without motion or notice . . . if a request is made, before the original time or its extension expires." Defendant seeks a sixty (60) day extension to the dispositive motion deadline which is set for today, January 24, 2022. Good cause is present to grant an extension of sixty (60) days to file Defendant's motion for summary judgment. Counsel for Defendant has only been recently assigned to this case. This case had been recommended for dismissal, and the district court has not yet determined whether to adopt that recommendation. Dispositive motions should not be filed until this Court determines whether dismissal is appropriate based on Plaintiff's unexplained failure to update his address while he was on parole. To do otherwise, would have required Counsel for the Defendant to spend countless hours preparing a dispositive motion which ultimately would be moot if the Court adopts the Report and Recommendation. Counsel for Defendants reasonably concluded that the countless hours required to familiarize himself with the facts and legal issues in this case would be better used in pursuing more pressing matters, which have been made all the more pressing by his father's passing causing a double workload, the holidays, and his personal family emergencies. Accordingly, Defendant respectfully

requests that the extension be granted for good cause. *See Ahanchian v. Xenon Pictures, Inc.*, 624 F.3d 1253, 1260, (9th Cir. 2010) (holding that the “district court abused its discretion in denying party’s timely motion” to extend time because the party “demonstrated the ‘good cause’ required by Rule 6, and because there was no reason to believe that [the party] was acting in bad faith or was misrepresenting his reasons for asking for the extension”).

CONCLUSION

For the forgoing reasons, and for good cause appearing, the Defendants request an extension as follows:

1. The time for the parties to file any dispositive motion be extended by sixty (60) days from Monday, January 24, 2022, to Friday, March 25, 2022.

2. If no dispositive motions are filed, the Joint Pretrial Order shall be filed on or before Monday, April 25, 2022. If the parties file dispositive motions, the Joint Pretrial Order shall be filed thirty (30) days after the Court serves its order disposing of the dispositive motions, or further Court order.

Dated this 24th day of January, 2022.

AARON D. FORD
Attorney General

By: /s/ Chris Davis
Chris Davis

Attorneys for Defendants

ORDER

Good cause appearing, IT IS
ORDERED that ECF No. 38 is
GRANTED.

IT IS SO ORDERED

DATED: 9:26 am, January 25, 2022


BRENDA WEKSLER
UNITED STATES MAGISTRATE JUDGE

CERTIFICATE OF SERVICE

I certify that I am an employee of the State of Nevada, Office of the Attorney General, and that on January 24, 2022, I electronically filed the foregoing **DEFENDANTS' MOTION TO EXTEND DISPOSITIVE MOTIONS DEADLINE ESTABLISHED BY COURT ORDER (ECF NO. 29)** via this Court's electronic filing system. Parties who are registered with this Court's electronic filing system will be served electronically. For those parties not registered, service was made by depositing a copy for mailing in the United States Mail, first-class postage prepaid, at Las Vegas, Nevada, addressed to the following:

Jeremy Bryson, #1084207
High Desert State Prison
P.O. Box 650
Indian Springs, Nevada 89070
Email: HDSP_LawLibrary@doc.nv.gov
Plaintiff, Pro Se

/s/ Chris Davis
An employee of the Office of the
Nevada Attorney General

Exhibit A

Exhibit A

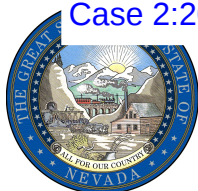


Department of Corrections

CASE NOTE PRINTOUT REPORT

FROM: 09/01/2020 TO: 01/24/2022

ID#: 1084207	Name: BRYSON, JEREMY	Location: HDSP-U1-C-5-A
Date / Time: 11/12/2020 - 10:55	Type / Subtype: CLASS / RCL_P	Staff Member: MIRO, TEDDY
Periodic review, completed at HDSP. RFS: 12, Inmate Bryson is a 42 year old fifth term parole violator serving 19 to 48 months for Grand Larceny Auto (Cat C). Housed in protective custody due to issues with Aryan Warriors. Inmate is currently assigned as a unit Barber. Holds/Detainers = None. JOC checked and verified with OSM. Religion = Christian, Emergency Contact = Juan Martinez friend (301)332-0201. Education = HSD 1996, Language = English, Commit = Clark Co. Last Disciplinary = G25 on 05/08/2019, Offender Non-Association= 2@HDSP. Med:1-1, Den:1-1, Psych:2-7, STG= None, Birth Certificate = verified in I-file, Social Security Card = verified not in I-file, No Special diet noted, S and P Alerts noted, Per NOTIS no upcoming court dates noted. Inmate Claims was not in Foster Care System. Has not served in the U.S. Military. Claims 2 children and does not receive visits. Inmate is a US Citizen. Has prior escape from PCC on 12/08/2015.PED= 03/25/2021 MPR= 12/10/2021 PEXD=06/12/2022 . No MIN/317 due to prior escape history and protective segregation. Rx remain HDSP/PSU/CLS. ...[SBARRETT updated the case note on 11/18/2020 12:59:45] Concur remain HDSP/CLOSE/PSU due to issues with STG-AWs.		
Date / Time: 12/10/2020 - 09:40	Type / Subtype: VITAL / SSNREC	Staff Member: EVICA, HEATHER
Social Security Card Application received at Casa Grande Transitional Housing. Verified and tracked by Vital Records Program Officer. Application forwarded to Social Security Administration.		
Date / Time: 12/23/2020 - 08:04	Type / Subtype: PAR_PRG / IMT_STMT	Staff Member: SALAVEA, KONEILIO
Mr. Bryson is serving 19 to 48 months for Grand Larceny Auto (Cat C). He is currently housed at HDSP/MED/PSU. Projected dates: PED=03/25/2021; MPR=12/10/2021; PEXD=06/12/2022. In regards to the offense, Mr. Bryson states, "I take full responsibility for my actions. I am aware of the pain and suffering that I have caused to the victims. Breaking the Law is selfish. I do not want to be a selfish person."		
Date / Time: 12/23/2020 - 08:04	Type / Subtype: PAR_PRG / INST_ADJ	Staff Member: SALAVEA, KONEILIO
Mr. Bryson is a medium custody inmate currently housed at High Desert State Prison. According to NOTIS, Mr. Bryson has no STG, and has received no disciplinary action against him in the last twelve months. In regards to institutional adjustment, Mr. Bryson states, "I have completed Commitment to Change Phases I II III. I am the Barber in my unit. I have no issues with staff."		
Date / Time: 12/23/2020 - 08:05	Type / Subtype: PAR_PRG / WRK_ED_PFRM	Staff Member: SALAVEA, KONEILIO
According to NOTIS, Mr. Bryson has a HSD and Associate of Arts. Mr. Bryson is currently assigned as a Unit Barber. In regards to work/educational performance, Mr. Bryson states, "I am the Barber in my Unit. I am enrolled in Blackstone Legal School and will be graduating at the end of the year"		
Date / Time: 12/23/2020 - 08:05	Type / Subtype: PAR_PRG / COMM_SUPRV	Staff Member: SALAVEA, KONEILIO
According to PSI, Cocaine is problematic for Mr. Bryson. With regards to community supervision needs, Mr. Bryson states, "I will be going to Novum-U program. I will be living within the structured environment at the Lake Mead Inn."		
Date / Time: 12/23/2020 - 08:05	Type / Subtype: PAR_PRG / ADD_CMTS	Staff Member: SALAVEA, KONEILIO
Mr. Bryson states, "I do want Parole. I want to start a better life for myself and my children."		
Date / Time: 12/29/2020 - 07:19	Type / Subtype: SENT_MNG / SENT_MANG	Staff Member: CARTER, MELINDA
All records (written and electronic) regarding this inmate must be retained, please suspend normal document destruction procedures until further notice. Please insert Litigation Hold notices into: I-File, Medical File, Grievance File, Property File and Visiting File. Notified HDSP by email 12/29/2020. Case No. Case No. 2:20-cv-00089-JAD-BNW		
Date / Time: 01/19/2021 - 14:25	Type / Subtype: PAROL / PBNOTIF	Staff Member: MIRO, TEDDY
Inmate signed and was given a copy of parole board notification.		
Date / Time: 01/22/2021 - 10:46	Type / Subtype: VITAL / SSCARD	Staff Member: BROWN, OLIVIA
Social Security Card received at Casa Grande Transitional Housing. Verified and tracked by Vital Records Program Officer. SSC forwarded to HDSP		
Date / Time: 02/01/2021 - 08:24	Type / Subtype: GENERAL / GEN	Staff Member: MIRO, TEDDY
Inmate notified his telephonic interview scheduled for Friday, March 5,2021 @ 1330		
Date / Time: 02/04/2021 - 15:56	Type / Subtype: PAROL / PBHEAR	Staff Member: MIRO, TEDDY
Inmate present at HDSP Visitation for Parole Board Hearing via video conference. Commissioner Verchio and Hearing Representative Kingera present. Discussed nature of crime, previous criminal history, and institutional adjustment such as disciplinary and programming, and related factors. Discussed Aggravating and Mitigating factors the Parole Board will consider. Inmate advised that it takes four Commissioners to either grant or deny parole and that he should receive his results about three weeks from the date the final Commissioner votes.		

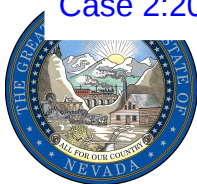


Department of Corrections

CASE NOTE PRINTOUT REPORT

FROM: 09/01/2020 TO: 01/24/2022

ID#: 1084207	Name: BRYSON, JEREMY	Location: HDSP-U1-C-5-A
Date / Time: 03/09/2021 - 12:09	Type / Subtype: VITAL / SSNFAC	Staff Member: KIM, CLARK
HDSP TX SSN card forwarded to facility ...[CKIM updated the case note on 03/12/2021 09:34:05] Fedex: 773139197698		
Date / Time: 03/26/2021 - 12:24	Type / Subtype: VITAL / SSNIFILE	Staff Member: WUEST, LARRY
Received this date and placed in I-File.		
Date / Time: 04/05/2021 - 08:00	Type / Subtype: GRV / GRV	Staff Member: MIRO, TEDDY
Inmate present at HDSP: Inmate notified, signed and given copies of his response to grievance #20063119147. Returned with a DOC-3098. Completed paperwork forwarded to AA.		
Date / Time: 04/20/2021 - 11:38	Type / Subtype: GRV / GRV	Staff Member: MIRO, TEDDY
Inmate present at HDSP: Inmate notified, signed and given copies of his response to grievance #20063120065. Returned with a DOC-3098. Completed paperwork forwarded to AA.		
Date / Time: 05/05/2021 - 10:05	Type / Subtype: CLASS / RCL_P	Staff Member: MIRO, TEDDY
HDSP Regular Review. RFS=7. Inmate is 43 years old fifth term parole violator serving 19 to 48 months for Grand Larceny Auto (Cat C).. Inmate is currently housed in Protective Segregation Unit due to STG issues with AWs but does not claim an STG. Detainers = None. Inmate is assigned a unit barber. Inmate does not receive a special diet; S L P Alert. Last OIC= none in the last 18 months. Emergency Contact= Kelly Moreland (mother) 301 332-0201. CMS=2@HDSP. STG=None Religion=Christian. Inmate is English speaking. Education=Associate of ART. MED: 1-1 DEN: 1-1 PSYCH: 1-1. Commit= Clark Co. BC and SSC verified is in the I-file. ID verified is not in I-file. Inmate did not serve in the United States Military. No time spent in foster care. Inmate is a U.S. Citizen. Claims 02 children; does not receive visits. Prior escape history (PCC). PREA Education, PREA Initial Assessment and PREA 30 day Follow-up Assessments reviewed and verified in NOTIS. PED=03/30/2021 MPD=12/15/2021 PEXD=06/17/2022. No MIN due to Prior escape history and protective segregation.		
CCS RX HDSP/CLS/ PSU ...[TTERNES updated the case note on 05/13/2021 08:24:52] Concur, recommend remain HDSP/CLS/PSU.		
Date / Time: 05/10/2021 - 09:49	Type / Subtype: PAROL / PBRSLT	Staff Member: MIRO, TEDDY
Inmate was given copy of yellow sheet stating ORDER DENYING PAROLE		
Date / Time: 07/06/2021 - 10:10	Type / Subtype: PAR_PRG / IMT_STMT	Staff Member: MIRO, TEDDY
Mr. Bryson is a 43 year old fifth term parole violator serving 19 to 48 months for Grand Larceny Auto (Cat C). He is currently housed at HDSP/MED/PSU. Projected dates: PED=03/30/2021 MPR=12/15/2021; PEXD=06/17/2022. In regards to the offense, Mr. Bryson states, "I accept full responsibility for my actions."		
Date / Time: 07/06/2021 - 10:10	Type / Subtype: PAR_PRG / INST_ADJ	Staff Member: MIRO, TEDDY
Mr. Bryson is a medium custody inmate currently housed at High Desert State Prison. According to NOTIS, Mr. Bryson has no STG, and has received no disciplinary action against him in the last twelve months. In regards to institutional adjustment, Mr. Bryson states, "I have maintained the barber position for the entire length of this current sentence. I am in protective segregation for cooperating with IG, I have maintained a proper, respectful relationship with staff and still do so."		
Date / Time: 07/06/2021 - 10:12	Type / Subtype: PAR_PRG / WRK_ED_PRFM	Staff Member: MIRO, TEDDY
According to NOTIS, Mr. Bryson has Associate of Arts. Mr. Bryson is currently assigned as unit barber. In regards to work/educational performance, Mr. Bryson states, "I have completed Commitment to Change I, II, and III. I also have put myself through Paralegal Law School, and completed it, now I am certified."		
Date / Time: 07/06/2021 - 10:13	Type / Subtype: PAR_PRG / COMM_SUPRV	Staff Member: MIRO, TEDDY
According to PSI, Mr. Bryson has a frequent abuse, serious disruption of functioning substance abuse history. With regards to community supervision needs, Mr. Bryson states, "I will be attending Halfway house program, while interstate compacting to California, to my Art Manager House where he will provide employment and support until I can support myself."		
Date / Time: 07/06/2021 - 10:13	Type / Subtype: PAR_PRG / ADD_CMTS	Staff Member: MIRO, TEDDY
Mr. Bryson states, "I have no comment."		
Date / Time: 09/20/2021 - 15:26	Type / Subtype: GENERAL / TELECONF	Staff Member: MIRO, TEDDY
HDSP Inmate has telephonic interview scheduled for September 21 2021 @ 1300. Notification was signed by inmate and forwarded to records for placed in I-File.		



Department of Corrections

CASE NOTE PRINTOUT REPORT

FROM: 09/01/2020 TO: 01/24/2022

ID#: 1084207 **Name: BRYSON, JEREMY** **Location: HDSP-U1-C-5-A**
Date / Time: 10/04/2021 - 09:58 **Type / Subtype:** PAROL / PBRSLT **Staff Member:** SINGER, DAVID
 Inmate granted Parole canary copy given to inmate

Date / Time: 10/25/2021 - 11:07 **Type / Subtype:** CLASS / RCL_P **Staff Member:** MIRO, TEDDY
 HDSP Regular Review. RFS=7. Inmate is 43 years old fifth term parole violator serving 19 to 48 months for Grand Larceny Auto (Cat C).. Inmate is currently housed in Protective Segregation Unit due to STG issues with AWs but does not claim an STG. Detainers = None. Inmate is assigned a unit barber. Inmate does not receive a special diet; S L P Alert. Last OIC= none in the last 18 months. Emergency Contact= Kelly Moreland (mother) 301 332-0201. CMS=2@HDSP. STG=None Religion=Christian. Inmate is English speaking. Education=Associate of ART. MED: 1-1 DEN: 1-1 PSYCH: 1-1. Commit= Clark Co. BC and SSC verified is in the I-file. ID verified is not in I-file. Inmate did not serve in the United States Military. No time spent in foster care. Inmate is a U.S. Citizen. Claims 02 children; does not receive visits. Prior escape history (PCC). PREA Education, PREA Initial Assessment and PREA 30 day Follow-up Assessments reviewed and verified in NOTIS. PED=02/28/2021 MPD=11/15/2021 PEXD=05/18/2022. No MIN due to Prior escape history and protective segregation.

CCS RX HDSP/CLS/ PSU ...[SBARRETT updated the case note on 11/01/2021 07:29:10] Concur remain HDSP/CLOSE/PSU due to issues with STG-AWs.

Date / Time: 11/10/2021 - 14:24 **Type / Subtype:** MEDI / APPL **Staff Member:** RUSSELL, MICHAEL
 HDSP TX Medi assistance accepted. ...[AWESTFALL updated the case note on 11/16/2021 13:39:37]

Application completed on 11/10/2021 and scanned to DWSS on 11/10/2021..

Application approved on 11/12/2021. Billing number: 00002886569

Date / Time: 11/12/2021 - 10:36 **Type / Subtype:** SENT_MNG / SENT_MANG **Staff Member:** CLARK, DENAE
 Approved Mandatory Parole on 11/22/2021
 No known active holds, detainer's or notifiers noted.
 PEXD = 5/18/2022
 MPR = 11/15/2021
 Per P&P Bell
 Clark County

Date / Time: 11/12/2021 - 11:29 **Type / Subtype:** GENERAL / SUPVREL **Staff Member:** CALDERWOOD, AMY
 Per NOTIS Inmate is Approved Mandatory Parole on 11/22/2021. No known active holds, detainer's or notifiers noted. PEXD = 5/18/2022 MPR = 11/15/2021. Per P&P Bell Clark County. Active alert screen confirming "R". All release paperwork has been completed by CCS and inmate, including Notification, Registration and Gun Laws and Parole documents. A copy of all documents have been placed in his release packet. RFS Card#70001450093 placed in release packet. A copy of all documents have been placed in his release packet. Exit blood draw forwarded to medical to be completed. Release ID requested from intake/reception. BC/SSC on I-file. Inmate will be paroled to 215 E Bonanza then to the Freedom House.

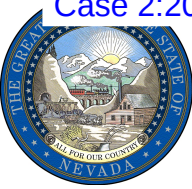
Date / Time: 01/04/2022 - 12:03 **Type / Subtype:** SENT_MNG / SENT_MANG **Staff Member:** CLARK, DENAE
 Parole Violator
 Warrant Date: 12/29/2021
 Arrest Date: 12/2/2021
 PEXD: 5/10/2022

Date / Time: 01/10/2022 - 10:25 **Type / Subtype:** PREA / PREA_ASS1 **Staff Member:** PADILLA, JOSHUA
 PREA ASSESSMENT COMPLETED IN NOTIS.

Date / Time: 01/10/2022 - 10:25 **Type / Subtype:** PREA / PREA_EDUC **Staff Member:** PADILLA, JOSHUA
 Inmate signed DOC 2096 Prison Rape Elimination Act (PREA) Orientation and Comprehensive Education indicating he viewed a video or transcript of same as well as receiving information regarding regulations and reporting instructions.

Date / Time: 01/10/2022 - 11:00 **Type / Subtype:** GENERAL / RREV **Staff Member:** PADILLA, JOSHUA
 Parole Violator (44 yo) w/no new charges, arrived at HDSP from CCDC on this date. PSI and Retake Warrant recvd. Denies STG, S/A, CMS - 1 @ HDSP. PSI & Jail Report state no gang affiliation. I/M claims 2 children, no foster care, no will. No medical concerns noted. Emergency Contact: Tara Russell (Friend) 702-503-5611. Selective Service - past the age to register. I/M will house HDSP/Intake/Adseg - Issues with the A/Ws, the inmate was the cellmate of inmate Goodman (murdered in front of 3-4 quad).

Date / Time: 01/23/2022 - 12:09 **Type / Subtype:** CLASS / INITIAL **Staff Member:** BARRETT, STACY
 Inmate Bryson is a 44 year old fifth term parole violator serving 19-48 months for Grand Larceny Auto (Cat C). Inmate is currently housed at HDSP intake/AD SEG due to issues with AWs STG, S alert noted. Parole violation report dated 12/7/21 reflects new charges that resulted in USMS case #



Department of Corrections

CASE NOTE PRINTOUT REPORT

FROM: 09/01/2020 TO: 01/24/2022

ID#: 1084207

Name: BRYSON, JEREMY

Location: HDSP-U1-C-5-A

2"2021-mj-00999-VCF-1 inmate was found guilty of alcohol or drugs and given 14 days credit time served to run concurrent with parole sentence. Detainers=None. No Security Threat Group / Special Diets noted. Central Monitored Separatees=HDSP /(53628 in unit 5) Escapes= MJ6 dated 12/08/2015 from PCC S alert noted for escape. Disciplinary=las oic guilty of a G25 on 5/8/19, pending a MJ22 from prior to parole. Pending Dental / Medical Classification / Psych restrictions=1-1. Declared Christian as a religious preference. Claimed has attained a High School Diploma in 1996 and is not eligible for education services. Clark County commit. Claimed never served in the US military. Inmate is a U.S. citizen. Claims two children. Denies substance abuse problems. Disclosed no history of foster care placement. Declared has no living will/advance directive(s). Claimed no access to birth certificate and claimed access to social security card, not physically in I-file. Emergency Contact Tara Russell (friend) # 702-503-5611 to be verified by reception CCS. Inmate has not yet been scheduled to appear before parole board commissioners and cannot leave HDSP until seen. Not eligible for residential confinement due to # prior felonies. Not eligible for minimum custody due to Escape history and protective needs. S-Alert noted. Projected Expiration Date=05/23/2022 pending revocation.

Recommend HDSP/Close/PSU, ok HDSP/Close/ADSEG pending approval/ medical/ revocation.

Total Number of Case Notes = 34

Exhibit B

Exhibit B



Division of Parole and Probation

Non-Technical Violation Report

Date: December 7, 2021

To the Honorable Board
 of Parole Commissioners
 Carson City, Nevada

☐ Inmate Program ☒ Parole ☐ Probation

Name: Bryson, Jeremy
 AKA: Jeremy Wayne Bryson
 File #: L22-0420M
 CC #: C339862
 NDOC #: 1084207

Supervision Grant: November 22, 2021
 Original Expiration: May 18, 2022
 Adjusted Expiration: May 18, 2022

Crime: CT I: GRAND LARCENY OF MOTOR VEHICLE (CATEGORY C FELONY)
 Sentence: 19-48 MOS NDOC/\$25AA/\$150DNA WAIVED/\$3DNACF

I. Violation(s) and Response to Imposed Sanctions:**Controlled Substance; Intoxicants; Laws; Conduct:**

On December 02, 2021, Mr Bryson was arrested by the National Park Service and charged with following:

- Operating a Motor Vehicle While Under the Influence of Alcohol or Drugs (M)
- Reckless Driving (M)
- Trespassing (M)

Mr. Bryson is currently in Federal Custody. Per the police report, the subject recklessly drove a vehicle that did not belong to him over the Hoover Dam. While doing so he failed to stop for any of the checkpoints. Due to that decision, the federal officers activated the barrier system, causing his vehicle to come to an immediate halt by crashing into them. Officers then ordered him to exit the vehicle but he did not comply initially. Eventually he did comply whereupon officers took him into custody and searched the vehicle. They located a glass pipe with a white crystal substance on the driver's side floorboard, a box of cigarettes with a plastic bag inside that had multiple clear crystal shards, an open container of alcohol in the front center console cup holder, and a bag of leafy green substance with a thick sticky brown residue (Controlled Substance; Intoxicants; Laws).

Mr. Bryson has failed to comply with the provisions of his parole agreement due to the above listed violations (Conduct).

II. Custody Status:

As of December 8, 2021, Mr. Bryson is in Federal custody at 333 S. Las Vegas Blvd.

III. Violation Hearing History:

This will be Mr. Bryson's first time returning to the Board for a violation hearing in this case.

IV. Mitigating Factors:

Although none of the subject's multiple pre-sentence investigation reports indicate the presence of diagnosed mental health issues, it is worth noting that the Parole Board ordered that the subject not be released to parole until "mental health medication management and treatment is coordinated with a



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provider." Likewise it is noteworthy that at the time of his arrest by federal officers, the subject had only been on parole for 11 days.

V. Recommendation:

It is recommended that a Retake Warrant be issued and the subject's parole be revoked

VI. Current Level of Supervision:

Intake

Pursuant to NRS 239B.030, the undersigned hereby affirms this document does not contain the social security number of any person.

Respectfully submitted:

S. Cabrera

S. Cabrera
2021.12.14 14:56:58 -08'00'

S. Cabrera, DPS Officer II
Division of Parole and Probation
scabrera@dps.state.nv.us
(702)-486-5436

Approved:

Michael VanDyke

Digitally signed by Michael VanDyke
Date: 2021.12.14 14:57:55 -08'00'

M. VanDyke DPS Sergeant
Division of Parole and Probation
mvandyke@dps.state.nv.us
(702) 236-4640

Exhibit C

Exhibit C



WARRANT FOR RETAKING A PAROLED PRISONER

To any Parole Officer or any Peace Officer Authorized to Arrest or Serve Criminal Process:

The undersigned, having probable cause to believe that JEREMY BRYSON, a paroled prisoner of the Nevada Department of Corrections, has violated the conditions of parole.

NRS 179.209 PROHIBITS THIS PAROLEE FROM BEING ADMITTED TO BAIL.

NOW, THEREFORE, pursuant to the provisions of, section 213.151 of Chapter 213, Nevada Revised Statutes, it is hereby ordered that said parolee be retaken and returned to the Nevada Department of Corrections and into the actual custody of the Director thereof, and you and each of you are hereby authorized and required to retake the parolee. For so doing, this warrant is legally sufficient.

Dated at Carson City, Nevada, this 24th day of December, 2021.

BOARD OF PAROLE COMMISSIONERS

[Signature]
Member of the Board of Parole Commissioners

DIVISION OF PAROLE AND PROBATION

[Signature]
Chief Parole and Probation Officer

WARRANT DATA

Date of Arrest.....

By.....

Agency.....